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*Additional Counsel to Lead Plaintiff Trigon
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[Additional counsel listed on signature block]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

Master File No. 17-cv-06779-RS

CLASS ACTION

This document relates to:

ALL ACTIONS.

**DECLARATION OF JACOB A.
WALKER IN OPPOSITION TO
MOTION FOR DISTRIBUTION OF
ATTORNEYS' FEES**

Date: N/A*
Time: N/A*
Courtroom: N/A*
Judge: Hon. Richard Seeborg

* The Court's September 25 order (ECF 268)
vacated the October 29, 2020 hearing

1 I, Jacob A. Walker, pursuant to 28 U.S.C. § 1746, declare as follows:

2 1. I am a partner in Block & Leviton LLP (“B&L”), counsel to Lead Plaintiff Trigon
3 Trading Pty Ltd. (“Trigon”), the sole Court-appointed Lead Plaintiff in the above-captioned
4 securities class action (the “Action”). B&L is a Court-appointed Co-Lead Counsel.

5 2. I submit this Declaration in opposition to the Motion To Distribute Attorneys’ Fees
6 by Hung Ta Law (“Ta Law”). I have direct and personal knowledge of the matters set forth in this
7 Declaration, and, if called to testify, I could and would competently testify thereto.

8 3. On November 22, 2019, I had an in-person conversation with Hung Ta regarding
9 the Tezos litigation. During that conversation, Ta told me that he had “no problem” with an equal
10 split of attorneys’ fees allocated to the Federal Action between his group (which I understood
11 referred to Hung G. Ta, Esq. PLLC, LTL Attorneys LLP, Restis Law Firm, P.C., and Lite DePalma
12 Greenberg, LLC) and our group (which I understood referred to Block & Leviton LLP and Hagens
13 Berman Sobol Shapiro LLP (“Hagens Berman”)—*i.e.*, the two other firms that participated in the
14 Federal Action).

15 4. I have never told or suggested to Hung Ta that Trigon would propose an allocation
16 that would result in his group receiving more than 25% of the total fees, nor am I aware of anyone
17 else (*i.e.*, other than Hung Ta) proposing such an allocation of fees.

18 5. At no point have I or anyone at my firm denied to Hung Ta (or anyone else in his
19 group) that Hagens Berman, Block & Leviton LLP, Robbins Geller Rudman & Dowd LLP, and
20 Taylor-Copeland Law were working together. To the contrary, we stated in open court—in both
21 this Court and the state court—that we were cooperating.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
23 7th day of October at Boston, Massachusetts.

24
25 /s/ Jacob A. Walker
26 Jacob A. Walker
27
28